UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	**MDL No. 2875**
THIS DOCUMENT RELATES TO ALL CASES	**HON. ROBERT B. KUGLER**

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Lori G. Cohen, Esq,**
GREENBERG TRAURIG, LLP
Terminus 200
3333 Piedmont Road NE
Suite 2500
Atlanta, Georgia 30305
Attorneys for Defendants

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of George Johnson, Ph.D., on October 4, 2021 at 9:00 a.m. British Standard Time (October 4, 2021 at 4:00 a.m. ET) and October 5, 2021, continuing until completion at Greenberg Traurig, LLP, London office, The Shard, Level 8, 32 London Bridge Street, London SE1 9SG, United Kingdom, in person and via Zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The witness shall produce the documents requested at Exhibit A, attached hereto, at least 48 hours in advance of the deposition, to the extent not already served upon Plaintiffs.

The videotaped deposition will be taken in person and via Zoom before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

September 24, 2021

By: /s/*Rosemarie Riddell Bogdan*

ROSEMARIE RIDDELL BOGDAN
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EXHIBIT A

DOCUMENT REQUESTS

1) Copies of all invoices bills, billing records, time records, and expense records for work performed in connection with any consultation or expert work performed for or on behalf of any defendant or their counsel with regard to any issues in this MDL, including but not limited to the review of documents, review and consultation with regard to plaintiff experts, preparation of Dr. Johnson's report, and preparation for deposition or trial; and information sufficient to identify your hourly rate, the amount of time you have spent in connection with your involvement in this Case, the nature of the activity or work your performed in connection with your involvement in this Case, and (d) the dates on which such activity or work was performed.

2) Copies of any notes, i.e., written or electronic, reflecting consulting or litigation work that hasnot been documented in invoices, and all consulting contracts or retention letters concerning your involvement in this litigation between you and any other person or entity, including but not limited to the Defendants' lawyers and any other organization.

3) Copies of any notes, handouts, posters, or other documentation, including PowerPoints, for any presentations,seminars, speech or other speaking engagement, or classes, given by Dr. Johnson with regard to drug safety and cancer risk; nitrosamines; the risks and benefits of any angiotensin II receptor blockers; or any other data, opinion or topic contained within your report.

4) Copies of any materials, documents or articles relied upon for the opinions set forth in the report served, including reference materials, if not listed in the report.

5) Copies of any materials, documents or articles that you have reviewed at any time and from any source in connection with the report served, your opinions in this case, angiotensin II receptor blockers, or nitrosamines, whether or not they are listed in the report or attachments thereto.

6) Any illustrations, PowerPoints, images, charts, tables or demonstrative exhibits that may be used by or with Dr. Johnson in connection with a Daubert hearing or trial testimony in this litigation.

7) Documentation of any research grant the witness has been provided to study any angiotensin II receptor blockers, or nitrosamines, or health effects potentially related thereto.

8) Documentation of any research the witness has performed or directed to be performed with regard to any angiotensin II receptor blockers, nitrosamines, or health effects potentially related thereto.

9) Copies of any documents including protocols or information about medication side effects, available to the witness from any hospital or academic institution where he has worked, had an appointment, or had privileges, which set forth information related to the risks and benefits of any angiotensin II receptor blocker or nitrosamine.

10) Any documents or other communications the witness has received from any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of information provided by counsel who retained the witness. This includes but is not limited to communications with health authorities, US Food and Drug Administration or any other governmental, federal, state, or local agency, patients, physicians, researcher, scientists, other retained experts, and other third-parties.

11) Any communications from the witness to any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of communications to counsel who retained the witness. This includes but is not limited to communications with health authorities, US Food and Drug Administration or any other governmental, federal, state, or local agency, patients, physicians, researcher, scientists, other retained experts, and other third-parties.

12) Any textbook referenced by the witness in forming his opinions.

13) All notes, calculations, memoranda, drawings, models, illustrations, diagrams, recordings or records generated or utilized by you in connection with your involvement in the Case, whether hand-written or in electronic format.

14) A list of all persons and background sources, if any, that you consulted and /or rely upon in connection with your opinions in this case and all interviews and statements taken by you or at your direction concerning this case including any notes, transcriptions, video or audio recordings associated with such.

15) A list of all articles, abstracts, studies, reports, seminar materials, presentations, publications, or other writings authored or co-authored by you from 2011 to the present, including (a) the name of the article, (b) the name of the publication in which it appeared or the seminar or conference at which it was presented, and (c) the date on which it was published or presented. This includes but is not limited to documents related to drug safety and cancer risk; nitrosamines; and any other data, opinion or topic contained in your report.

16) A list of all cases in which you have, during the past four years, provided to the court or to counsel an expert disclosure or expert report, or in which you have given a deposition or testified in court, including (a) the jurisdiction in which each case was filed or venued, (b) the case number, and (c) the party and attorney for whom you acted as an expert witness. **For each of these cases, please provide any transcripts of the depositions or trial testimony in your possession**

17) To the extent you rely on specific patient experience for your opinions in the Case, all records pertaining to such experience, with any confidential patient identifying information redacted.

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CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: */s/Rosemarie Riddell Bogdan*

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